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November 23, 2021

VIA ECF

The Honorable Tonianne J. Bongiovanni
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *UMG Records, Inc., et al. vs. RCN Telecom Services, LLC, et al.*
Civil Action No. 19-17272-MAS-TJB

Dear Judge Bongiovanni:

This firm represents Defendants in the above-referenced matter. We write jointly on behalf of Defendants, Plaintiffs, and Counterclaim-Defendants Rightscorp, Inc. and Recording Industry Association of America (“RIAA”) to request a 30-day extension of: (1) the deadline to submit written discovery disputes (from November 30, 2021 to December 30, 2021) and (2) the deadline for the close of fact discovery (from February 28, 2022 to March 30, 2022). *See* ECF No. 185. The Court has previously granted extensions of the aforementioned deadlines through ECF Nos. 150, 153, 157, 163, 181, and 185.

The parties continue to work towards an informal resolution of the discovery issues identified in prior letters to the Court. This includes issues regarding privilege logs, supplemental discovery responses, and productions of responsive documents and data. The parties are actively meeting and conferring regarding these issues; however, a number of issues remain to be resolved. The parties agree that these extensions are necessary and appropriate to complete that process. Good cause exists for the requested extensions, which are not being sought for purposes of delay. Additionally, because there are no deadlines set by the Court beyond the close of fact discovery, the requested extensions will not affect any other deadlines in this action.

For these reasons, the parties respectfully request that the above deadlines be extended as follows for good cause shown: (1) the deadline to submit written discovery disputes (from November 30, 2021 to December 30, 2021) and (2) the deadline for the close of fact discovery (from February 28, 2022 to March 30, 2022).

We have included a “So Ordered” provision at the end of this letter in the hope that these extensions are acceptable to the Court.

Respectfully Submitted,

/s/ Edward F. Behm, Jr.

EFB:gc

CC: All counsel of record via ECF

The above Application is SO ORDERED this ____ day of November, 2021.

The Honorable Tonianne J. Bongiovanni